

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

Ann Smith, et al.,

Plaintiffs,

v.

**New Jersey Education Association,
et al.,**

Defendants.

Case No. 1:18-cv-10381-RMB-AMD

Motion Date: October 1, 2018

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Melissa Poulson, Michael Sandberg, and Leonardo Santiago respectfully move for a preliminary injunction against the enforcement of the first and third sentences in the second paragraph of N.J. Rev. Stat. § 52:14-15.9e (2013), as amended by section 6 of the “Workplace Democracy Enhancement Act,” also known as A.3686.

The plaintiffs also seek a preliminary injunction against the payroll deduction of union dues from public employees who have not knowingly and freely consented to such payments since the Supreme Court’s ruling in *Janus v. American Federation of State, County, & Municipal Employees, Council 31*, 138 S. Ct. 2448 (2018).

The plaintiffs are seeking injunctive relief only against the state officials and public employers that they have sued, and not the union defendants. The attached memorandum of law sets forth our reasoning and authorities.

Respectfully submitted.

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Dated: August 28, 2018

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CERTIFICATE OF SERVICE

I certify that on August 28, 2018, I served this document by CM/ECF upon:

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